REMARKS

The Office Action dated February 20, 2008, has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1-15 and 21-27 are currently pending in the application, of which claims 1, 9, 11-13, and 15 are independent claims. Claims 1 and 9-15 have been amended, and claims 21-27 have been added, to more particularly point out and distinctly claim the invention. No new matter has been added. Claims 1-15 and 21-27 are respectfully submitted for consideration.

The Specification was objected to as "failing to provide proper antecedent basis for the claimed subject matter," with citation to 37 C.F.R. 1.75(d)(1) and MPEP 608.01(o). Specifically, the Office Action asserted that the specification was defective because there was no recitation or definition of "computer readable medium" in the specification. Applicants respectfully traverse this objection.

The Office Action requested "Correction," but it is not clear what correction is being requested, because the Office Action does not specify what correction is required. Accordingly, Applicants respectfully traverse the objection as unclear and providing some explanation regarding support for the feature "computer readable medium," recited in claim 12.

For example, the present specification at Figure 4 illustrates a "modification module" that one of ordinary skill in the art would appreciate could be implemented as a computer program product embodied on a computer-readable medium. Thus, Figure 4,

for example, provides adequate support for the recitation of "computer-readable medium" in claim 12.

Additionally, the Office Action in asserting that the specification fails to provide antecedent basis for the terms of the claim, appears to have overlooked that both 37 CFR 1.78(d)(1) and MPEP 608.01(o) state: "clear support **or** antecedent basis." (emphasis added) Thus, clear support in the specification is adequate under 37 CFR 1.75(d)(1), and there is no absolute requirement that antecedent basis be present. Accordingly, it is respectfully requested that the objection be withdrawn.

Claim 13 was rejected under 35 U.S.C. 101, as allegedly being non-statutory subject matter. The Office Action asserted that "the claim lacks the necessary physical articles or objects to constitute a machine or a manufacture within the meaning of 35 USC 101." It is respectfully requested that this rejection be withdrawn.

The Office Action asserted that although "the claim is disclosed as a system, the components of the claim are only software components. There are is [sic] no hardware recited in the claim." Even if these assertions were correct (not admitted), the rejection would be inappropriate, since a system must inherently be a tangible embodiment of the software elements. However, the assertions in the Office Action are not correct.

A "receiver unit" recited in claim 13 (as previously presented) is not simply software, but is hardware. Furthermore claim 13 (as amended), recites "a receiver" and "a transmitter," which are clearly hardware elements. Thus, the rejection is moot and should be withdrawn.

Claims 1-2 and 8-15 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Application Publication No. 2003/0007482 of Khello et al. ("Khello"). Applicants respectfully traverse this rejection.

Claim 1, upon which claims 2-8 depend, is directed to a method including receiving data to be supplied to database operations, the data including at least one Internet domain name comprising a plurality of successive labels separated by dots, said at least one Internet domain name being in a first format, wherein the at least one Internet domain name comprises at least one hostname and at least one top-level domain name. the method also includes conditionally converting at least one of said at least one Internet domain name into a second format of Internet domain name in which at least two successive labels of the at least one of said at least one Internet domain name are combined to form a single label, wherein the conditionally converting comprises converting the Internet domain name when the Internet domain name fulfills a predetermined condition. The method further includes supplying the data to the database operations, the supplied data including at least one Internet domain name in the second format.

Claim 9, upon which claims 10 depends, is directed to a system including receiving means for receiving data to be supplied to database operations, the data including at least one Internet domain name comprising a plurality of successive labels separated by dots, said at least one Internet domain name being in a first format, wherein the at least one Internet domain name comprises at least one hostname and at least one top-level domain name. The system also includes converting means for conditionally

converting at least one of said at least one Internet domain name into a second format of Internet domain name in which at least two successive labels of the at least one of said at least one Internet domain name are combined to form a single label, wherein the second means is configured to convert the Internet domain name when the Internet domain name fulfills a predetermined condition. The system further includes supplying means for supplying the data to database operations, the supplied data including at least one Internet domain name in the second format.

Claim 11, upon which claims 21-27 depend, is directed to an apparatus including a first interface configured to receive data to be supplied to database operations, the data including at least one Internet domain name comprising a plurality of successive labels separated by dots, said at least one Internet domain name being in a first format, wherein the at least one Internet domain name comprises at least one hostname and at least one top-level domain name. The apparatus also includes a converter configured to conditionally convert at least one of said at least one Internet domain name into a second format of Internet domain name in which at least two successive labels of the at least one of said at least one Internet domain name form a single label, wherein the modification module is configured to convert the Internet domain name when the Internet domain name fulfills a predetermined condition. The apparatus further includes a second interface configured to supply the data to database operations, the supplied data including at least one Internet domain name in the second format.

Claim 12 is directed to a computer program product embodied on a computer readable medium. The product includes computer readable code configured to cause a

computer to substantially perform receiving data to be supplied to database operations, the data including at least one Internet domain name comprising a plurality of successive labels separated by dots, said at least one Internet domain name being in a first format, wherein the at least one Internet domain name comprises at least one hostname and at least one top-level domain name. The product also includes computer readable code configured to cause a computer to substantially perform conditionally converting at least one of said at least one Internet domain name into a second format of Internet domain name in which at least two successive labels of the at least one of said at least one Internet domain name are combined to form a single label, wherein the conditionally converting comprising converting the Internet domain name when the Internet domain name fulfills a predetermined condition. The product further includes computer readable code configured to cause a computer to substantially perform supplying the data to the database operations, the supplied data including at least one Internet domain name in the second format.

Claim 13, upon which claim 14 depends, is directed to a system including a receiver configured to receive data to be supplied to database operations, the data including at least one Internet domain name comprising a plurality of successive labels separated by dots, said at least one Internet domain name being in a first format, wherein the at least one Internet domain name comprises at least one hostname and at least one top-level domain name. The system also includes a converter configured to convert at least one of said at least one Internet domain name into a second format of Internet domain name in which at least two successive labels of the at least one of said at least one

Internet domain name are combined to form a single label, wherein the conversion unit is configured to convert the Internet domain name when the Internet domain name fulfills a predetermined condition. The system further includes a transmitter configured to supply the data to database operations, the supplied data including at least one Internet domain name in the second format.

Claim 15 is directed to an apparatus including first interface means for receiving data to be supplied to database operations, the data including at least one Internet domain name comprising a plurality of successive labels separated by dots, said at least one Internet domain name being in a first format, wherein the at least one Internet domain name comprises at least one hostname and at least one top-level domain name. The apparatus also includes modification means for conditionally converting at least one of said at least one Internet domain name into a second format of Internet domain name in which at least two successive labels of the at least one of said at least one Internet domain name form a single label, wherein the modification means is configured to conditionally convert the Internet domain name when the Internet domain name fulfills a predetermined condition. The system further includes second interface means for supplying the data to database operations, the supplied data including at least one Internet domain name in the second format.

Applicants respectfully submit that Khello fails to disclose or suggest all of the elements of any of the presently pending claims.

Khello generally relates to a method and apparatus for resolving an entity identifier into an internet address using a domain name system (DNS) server and an

entity identifier portability database. As explained at paragraph [0055], Khello suggests that a user A may enter an E.164 telephone number for user B into his user equipment. The user equipment may then generate a query. After various processing in the network, a DNS server may access its mobile number portability database which includes B's telephone number, and forward a corresponding IP address along with B's telephone number back to A's user equipment. As Khello explains at the end of paragraph 0055, this whole process may be performed so that a game may be played between users A and B.

Khello fails to disclose or suggest all of the elements of any of the presently pending claims. For example, Khello fails to disclose or suggest "conditionally converting at least one of said at least one Internet domain name into **a second format of Internet domain name** in which at least two successive labels of the at least one of said at least one Internet domain name are combined to form a single label," (emphasis added) as recited in claim 1, or the similar recitations of independent claims 9, 11-13, or 15 (each of which has its own respective scope). In Khello there is no conversion **into** any format of Internet domain name, but in Khello an E.164 is merely *extracted from* the original Internet domain name. That is to say, in Khello the original Internet domain name as such is *not* actually *converted into* another format, and certainly is not converted into another format of Internet domain name, even if it could be said (not admitted), that Khello's "Internet domain name" is converted into a format of some other kind or that Khello's E.164 number is converted into a format of "Internet domain name."

The Office Action took the position that paragraph [0058] of Khello discloses such features. Specifically, the Office Action stated that the ENUM request is converted to an E.164 telephone number by a DNS server extracting the E.164 telephone number. However, as noted above, an E.164 number is not a format of an Internet domain name. Instead, in this instance, it is merely data extracted from an ENUM request.

Additionally, Khello fails to disclose or suggest, "wherein the conditionally converting comprises converting the Internet domain name when the Internet domain name fulfills a predetermined condition," as recited in claim 1, or the similar recitations of independent claims 9, 11-13, or 15 (each of which has its own respective scope).

The Office Action took the position that the ENUM request to E.164 telephone number conversion "is done upon the condition of the second server receiving an ENUM request." Such a condition, however, clearly does not correspond to the claimed condition, "when the Internet domain name fulfils a predetermined condition" as the reception of an ENUM request does not in any way indicate whether the Internet domain name contained therein fulfills any predetermined condition or not.

In fact, Khello does not seem to set any particular conditions, whatsoever, for the extraction of the E.164 number from the ENUM message dependent on any Internet domain name fulfilling any predetermined conditions, whatsoever. Thus, it is respectfully submitted that Khello cannot possibly teach the recitation of claim 1: "wherein the conditionally converting comprises converting the Internet domain name when the Internet domain name fulfills a predetermined condition."

It is also respectfully submitted that Khello fails to disclose or suggest, "supplying the data to the database operations, the supplied data **including at least one Internet domain name in the second format**," (emphasis added) as recited in claim 1, or the similar recitations of independent claims 9, 11-13, or 15 (each of which has its own respective scope). As discussed above, in Khello the E.164 number is merely extracted from the original Internet domain name. That is to say, the original Internet domain name as such is not actually converted to another format of Internet domain name.

Thus, the extracted number (which is what the Office Action corresponded to the claimed "Internet domain name in the second format") does not correspond to an Internet domain name in any format any more. Accordingly, Khello does not disclose or suggest, "supplying the data to the database operations, the supplied data **including at least one Internet domain name in the second format**," (emphasis added) as recited in claim 1.

Thus, for at least the reasons set forth above, it is respectfully requested that the rejection of claims 1, 9, 11-13, and 15 be withdrawn. Claims 2, 8, 10, and 14 depend from and further limit claims 1, 9, and 13 respectively. Thus, it is respectfully submitted that each of claims 2, 8, 10, and 14 discloses subject matter that is neither disclosed nor suggested in Khello. It is, therefore, respectfully requested that the rejection of claims 2, 8, 10, and 14 be withdrawn.

Claims 3-7 were rejected under 35 U.S.C. 103(a) as being unpatentable over Khello in view of U.S. Patent No. 6,963,928 of Bagley et al. ("Bagley"). The Office Action acknowledged that Khello does not disclose at least some of the further

limitations of these claims, which all depend from claim 1, and cited Bagley to remedy such deficiencies. Applicants respectfully traverse this rejection.

At least some of the deficiencies of Khello with respect to claim 1 are discussed above. Whether or not Bagley remedies the deficiencies identified in the Office Action, Bagley does not remedy the above-identified deficiencies of Khello, and consequently the combination of Khello and Bagley fails to disclose or suggest all of the elements of any of the presently pending claims.
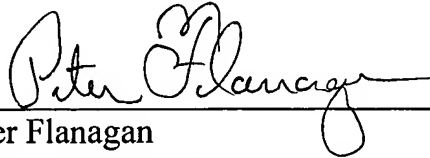
Bagley generally relates to system and methods for communications across various communication applications using single address strings. Thus, it is unsurprising that Bagley fails to remedy the specific deficiencies of Khello identified above. Since Bagley does not remedy those deficiencies, it is respectfully requested that the rejection of claims 3-7 be withdrawn.

For the reasons set forth above, it is respectfully submitted that each of claims 1-15 and 21-27 recites subject matter that is neither disclosed nor suggested in the cited art. It is, therefore, respectfully requested that all of claims 1-15 and 21-27 be allowed and that this application be passed to issuance.

If, for any reason, the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, Applicants' undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, Applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

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Enclosures: Additional Claims Transmittal
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